

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CAROL STASZEWSKI,

Plaintiff,

v.

Civil Action No. 05-10930 NMG

WELLESLEY COLLEGE,

Defendant.

**JOINT MOTION TO EXTEND PRETRIAL SCHEDULING  
ORDER DEADLINES**

The parties in this action, through counsel, hereby respectfully request that the Court extend the scheduling order deadlines in this case as set forth below:

1. Fact depositions to be completed and Rule 36 Requests for Admissions to be served by May 31, 2007.
2. Plaintiff to designate expert witnesses by May 31, 2007.
3. Defendant to designate expert witnesses by June 30, 2007.
4. Expert depositions to be completed by July 31, 2007.
5. Dispositive motions to be served by September 30, 2007.
6. Oppositions to dispositive motions to be served within thirty days of service of dispositive motions.

As grounds for this motion, the parties state that they have entered into negotiations and believe resolution may be achieved through negotiations. In the event no resolution is achieved, the parties need additional time to finish discovery.

CAROL STASZEWSKI,  
By her attorney,

WELLESLEY COLLEGE,  
By its attorneys,

HOLLAND & KNIGHT LLP

/s/ Mitchell J. Notis  
Mitchell J. Notis (BBO # 374360)  
Law Office of Mitchell J. Notis  
370 Washington Street  
Brookline, MA 02445

/s/ Miriam J. McKendall, P.C.  
Miriam J. McKendall, P.C. (BBO # 548825)  
Holland & Knight LLP  
10 St. James Avenue  
Boston, Massachusetts 02116  
(617) 523-2700

Dated: March 28, 2007

CERTIFICATE OF SERVICE

I, Miriam J. McKendall, P.C., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to any non-registered participants as indicated in the Notice of Electronic Filing, this 28th day of March, 2007.

/s/ Miriam J. McKendall, P.C.  
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10 St. James Avenue  
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